

REMARKS

This response is being filed in reply to the Office Action dated May 29, 2008, which reopened prosecution of the above-identified patent application.

Applicant wishes to thank Examiner Saif A. Alhija for the telephone interview on June 5, 2008, with Applicant's attorney, David T. Millers. During that interview, the due date for reply to the Office Action dated May 29, 2008 was discussed, and the Examiner confirmed that the shortened statutory period for reply expires three (3) months after the notification date of the Office Action since the Office Action contained a new rejection based on the merits of the Application. Accordingly, the deadline for this response to the Office Action is August 29, 2008.

Claims 1-12 and 17-26 were pending in the above-identified application when last examined and are amended as indicated above. In particular, non-elected claims 21-26, which were withdrawn from consideration, are being canceled.

Claims 1-4 were rejected under 35 U.S.C. § 103(a) as unpatentable over S.A. Savari, "Renewal Theory and Source Coding," Proceedings of the IEEE 88(11), pp 1692-1702, (2000), herein after Savari, in view of U.S. Pat. No. 6,674,908 (Aronov). Applicant respectfully traverses the rejection.

Independent claim 1 is patentable over the combination of Savari and Aronov at least for reciting, "outputting the substrings in a random order to generate an output sequence simulating the input sequence."

Savari discloses compression of input sequences. Aronov discloses compression and encryption of input sequences. Neither Savari nor Aronov disclose generating "an output sequence simulating the input sequence" because Savari and Aronov teach encoding an input sequence but do not suggest simulating the input sequence. Accordingly, claim 1 is patentable over the combination of Savari and Aronov because the reference taken together or separately fail to disclose an output sequence simulating an input sequence.

Savari and Aronov also fail to disclose or suggest outputting substrings of an input sequence "in a random order to generate an output sequence," as recited in claim 1. The Examiner noted that "Savari does not disclose outputting substrings in a random order," but

cited Aronov for disclosing this step. However, Aronov as indicated above is directed to compression and encryption. Aronov teaches output of distances, dictionary indices, and protocols for further compression. See, for example, steps 216 and 222 in Fig. 1a of Aronov and steps 220 and 222 of Fig. 2 of Aronov. Aronov does not output substrings of an input sequence.

Aronov is concerned with secure encryption of the input data and concerned that “redundancy in the original data could be used to decode the ciphered information.” See Aronov, col. 3, lines 32-34. To improve encryption, Aronov uses a random number generator (RNG) to generate a dictionary for encoding of input data. In regard to use of random order, Aronov states, “the samples of the RNG are used not in the order they were generated, but in random order to approximate the BINS” (Block of Input Numerical Sequence). See Aronov, col. 9, lines 4-6. Aronov uses random here to refer to the fact that the generation of samples in the dictionary is random, not that substrings in an output sequence are in random order. As noted above, Aronov teaches output of dictionary indices (not substrings) and even the indices are output in an order to approximate the binary input numerical sequence.

For the above reasons, the combination of Savari and Aronov fails to suggest “outputting the substrings in a random order to generate an output sequence simulating the input sequence,” as recited in claim 1. Accordingly, claim 1 is patentable over Savari and Aronov.

Claims 2-4 depend from claim 1 and are patentable over the combination of Savari and Aronov for at least the same reasons that claim 1 is patentable over the combination of Savari and Aronov.

For the above reasons, Applicant requests reconsideration and withdrawal of the rejection under 35 U.S.C. § 103.

Claims 5-12 were objected to as dependent upon a rejected claim but were indicated as allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claims. Claim 5-12 remain in dependent form, but for the reasons given above, the base claim 1 and intervening claim 4 are allowable. Accordingly, Applicant requests reconsideration and withdrawal of the objection to claim 5-12.

Applicant thanks the Examiner for allowance of claims 17-20.

For the above reasons, Applicant respectfully requests allowance of the application including claims 1-12 and 17-20. Please contact the undersigned attorney at (530) 621-4545 if there are any questions concerning this document.

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Respectfully submitted,



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